



December 20, 2007

Stephen McComb
Chicago Climate Exchange
190 South LaSalle St., Suite 1100
Chicago, IL 60603

COPY

Dear Mr. McComb:

**Idaho Soil
Conservation Commission**

PO Box 790
2270 Old Penitentiary Road
Boise, ID 83701-0790

Phone (208) 332-8650
Fax (208) 334-2386

scc.idaho.gov

Governor

C.L. "Butch" Otter

Commission Members

Bill Flory
Dwight Horsch
Richard Rush
J. Morgan Evans
Joe Davidson

Administrator

Jerry Nicolescu

The Idaho Soil Conservation Commission (ISCC) is working with the Idaho Carbon Sequestration Advisory Committee to develop a Carbon Credit Exchange Framework for the State of Idaho. The purpose of the Framework document is to provide guidance and assistance to farmers, ranchers, and private foresters to facilitate their participation in carbon offset trading. As part of our effort, we are currently developing pilot projects for rangeland, non-industrial forestland, and cropland for possible trading through the Chicago Climate Exchange (CCX). *(See Figure 1, attached)*

We are currently working with the National Carbon Offset Coalition (NCO) to assemble a rangeland portfolio in approved areas within Idaho. This rangeland designation would be in accordance with both CCX and the Natural Resources Conservation Service (NRCS) guidelines and specifications. *(See Table 1, attached)* Rangeland, grassland, and forestland acreages in Idaho have already been recognized by CCX as having approved, designated regions. As yet, CCX has not designated a cropland region for our State.

We are requesting that CCX's Soil Carbon Offset Technical Advisory Committee for Agriculture consider approving a designated "cropping region" for Idaho, based on the NRCS NORTHWEST WHEAT AND RANGE REGION MAJOR LAND RESOURCE AREA. *(See Figure 2, attached)*

In support of this request, we have included four reports *(See Reports 1-4, attached)* produced by staff at the Agricultural Research Service Center, located in Kimberly, Idaho. These documents address carbon sequestration as it relates to irrigated agriculture.

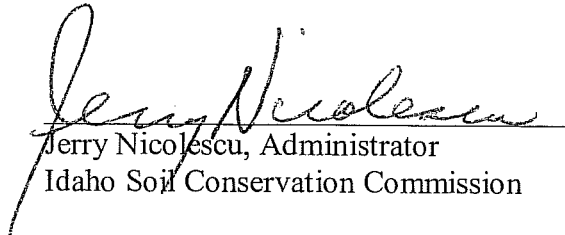
In addition, we are actively working with research staff at the University of Idaho and Washington State University to compile, evaluate, and format available field research pertaining to impacts of different tillage systems, cropping systems, and other management practices. The goal is to determine the carbon sequestration potential of soils and crops occurring within the above-mentioned land resource area.

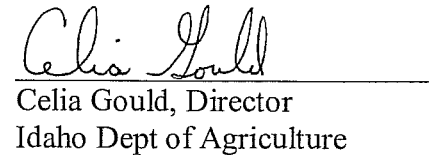
As part of our Best Management Practices (BMPs) Effectiveness Evaluations, we are also working with NRCS and ISCC field staff to collect

soils quality data, including organic matter impacts. We are eager to submit this information to your technical advisory committee as it is developed. Please advise us as to *what specific information the committee will need to approve a designated cropping region* for Idaho.

Your consideration and assistance with regard to this request is greatly appreciated.

Sincerely,


Jerry Nicolescu, Administrator
Idaho Soil Conservation Commission


Celia Gould, Director
Idaho Dept of Agriculture

cc: Ted Dodge, NCOC
Neil Sampson, NCOC
Richard Sims, NRCS

ARB/cpy
Enclosures

Carbon Sequestration Pilot Project Areas Idaho

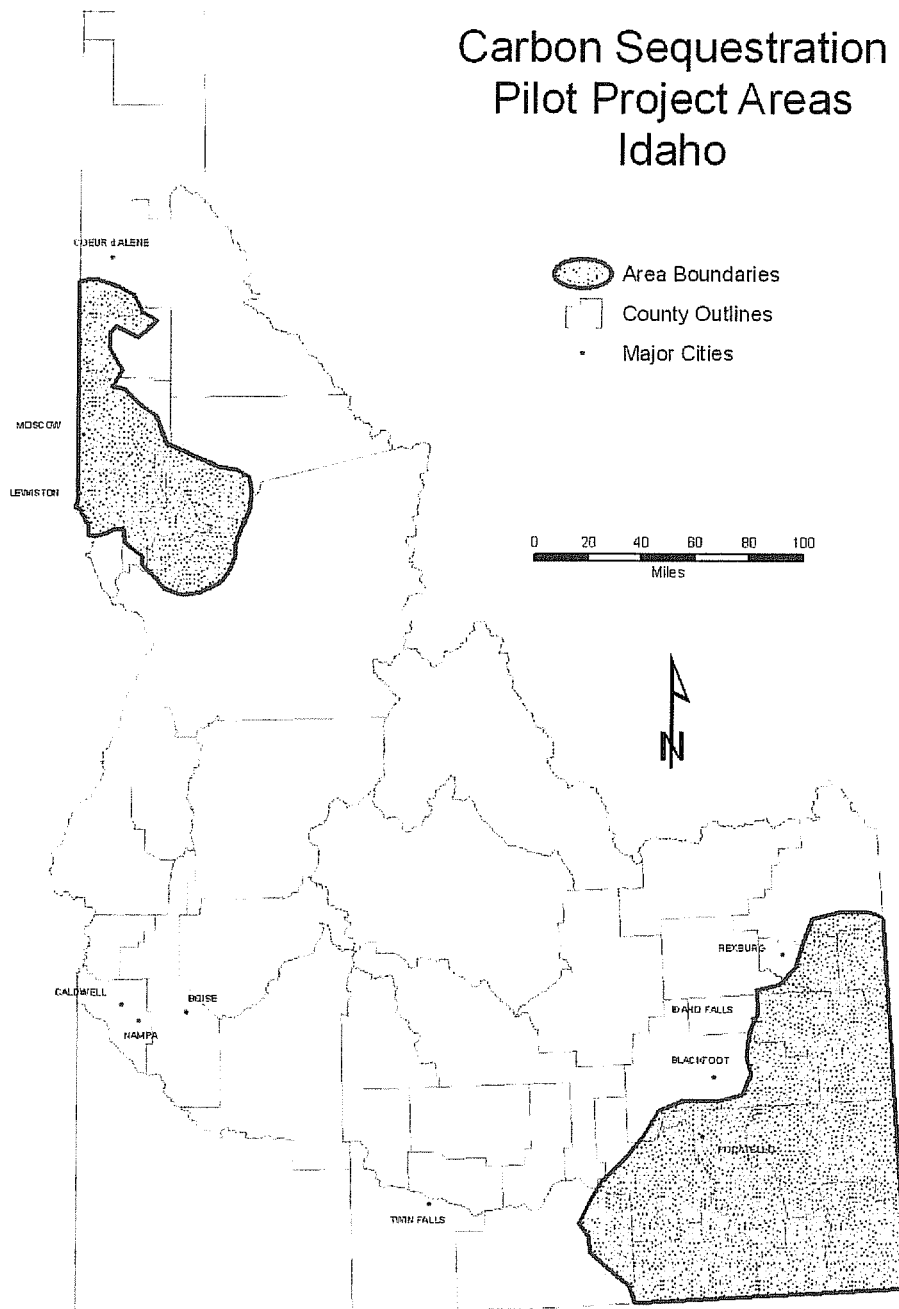


Figure 1

Land Resources Region (LRR) B
Idaho Counties that Qualify for
Rangeland Soil Carbon Management Offsets

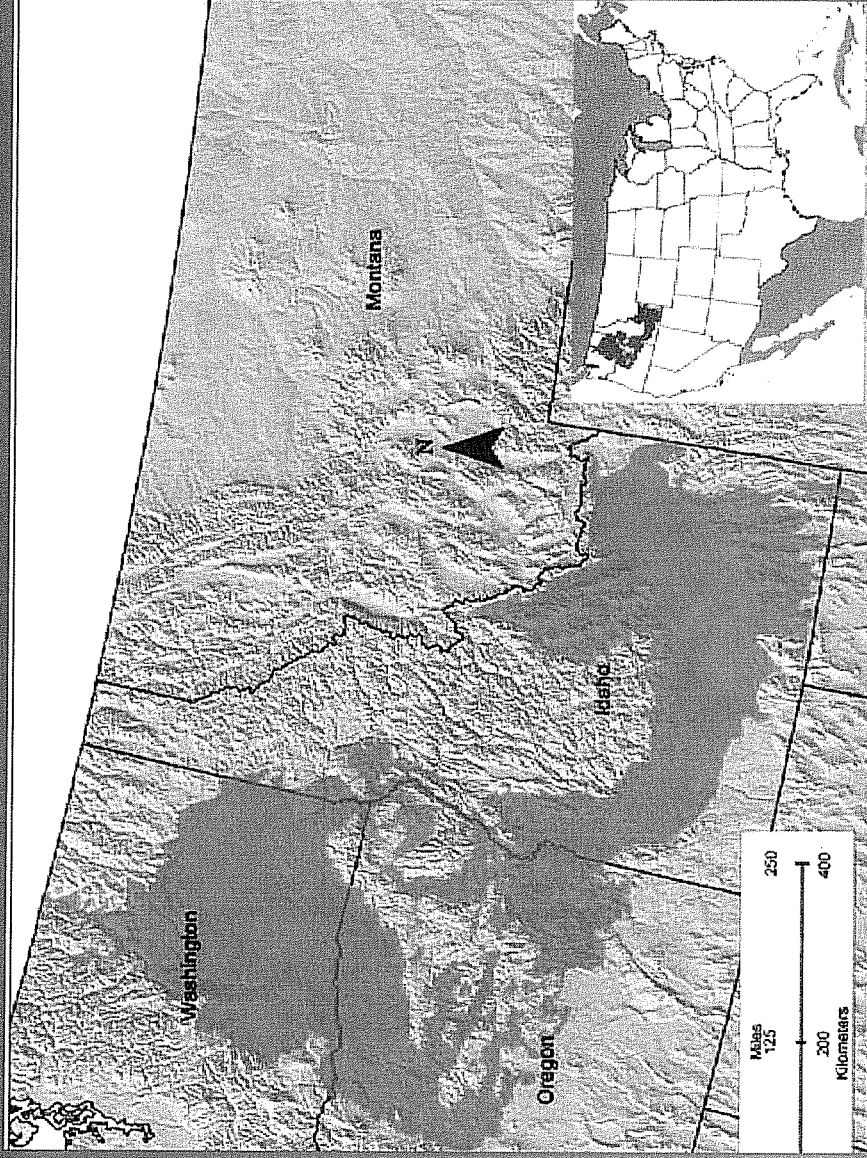
1. Ada	16. Gooding
2. Bannock	17. Jefferson
3. Bear Lake	18. Jerome
4. Bingham	19. Latah
5. Blaine	20. Lemhi
6. Bonneville	21. Lewis
7. Butte	22. Lincoln
8. Camas	23. Madison
9. Caribou	24. Minidoka
10. Canyon	25. Nez Perce
11. Cassia	26. Payette
12. Clark	27. Power
13. Elmore	28. Teton
14. Fremont	29. Washington
15. Gem	

Rangeland Offset Project Eligibility

Northwest Wheat and Range Region

Following are the various kinds of land use in this MLRA:

Cropland—private, 28%
Grassland—private, 18%;
Federal, 47%
Urban development—private, 4%
Water—private, 1%
Other—private, 2%



Determined by the rangeland's location within geographic areas defined by the USDA Land Resources Regions within the State

Figure 2